

# **United States Government Accountability Office Washington, DC 20548**

December 15, 2008

**Congressional Committees** 

Subject: Improvement Continues in DOD's Reporting on Sustainable Ranges, but Opportunities Exist to Improve Its Range Assessments and Comprehensive Plan

Recent operations in Iraq, Afghanistan, and other locations around the world have highlighted the need for U.S. forces to train as they intend to fight. Department of Defense (DOD) training ranges and operating areas are required to be managed and operated to support their long-term viability and utility to meet the national defense mission. The use of military training ranges enhances training by providing realistic, hands-on experience. Sustainable training range management focuses on the practices that allow the military to manage its ranges in a way that ensures their usefulness well into the future. Because the military faces obstacles in acquiring new training lands, the preservation and sustainable management of its current lands must be priorities. New advances in technology, coupled with a shift in force posture, mean that DOD needs to continually update and maintain its training ranges. Military training ranges vary in size from a few acres—for small arms training—to over a million acres for large maneuver exercises and weapons testing, and include broad open ocean areas for offshore training and testing. These ranges face ever increasing limitations and restrictions on land, water, and airspace as residential, commercial, and industrial development continues to expand around and encroach upon once remote military training and testing installations.

Section 366 of the Bob Stump National Defense Authorization Act for Fiscal Year 2003, dated December 2, 2002, required that the Secretary of Defense report on several items related to its training ranges. First, it required the Secretary to develop a comprehensive plan for using existing authorities available to the Secretary and the military services to address training constraints caused by limitations on the use of military lands, marine areas, and airspace—both in the United States and overseas. Section 366 of the act required the Secretary of Defense, in preparing the plan, to conduct an assessment of current and future training range requirements and an evaluation of the adequacy of current DOD resources—including virtual and constructive assets as well as military lands, marine areas, and airspace available in the United States and overseas—to meet current and future training range requirements. The plan was to include (1) proposals to enhance training range capabilities and address any shortfalls in DOD resources identified pursuant to the

-

<sup>&</sup>lt;sup>1</sup> Pub. L. No. 107-314 (2002).

a. REPORT <b>unclassified</b>	b. ABSTRACT <b>unclassified</b>	c. THIS PAGE unclassified	Same as Report (SAR)	28		
16. SECURITY CLASSIFICATION OF:			17. LIMITATION OF ABSTRACT	18. NUMBER OF PAGES	19a. NAME OF RESPONSIBLE PERSON	
15. SUBJECT TERMS						
14. ABSTRACT						
13. SUPPLEMENTARY NO	OTES					
12. DISTRIBUTION/AVAIL Approved for publ	LABILITY STATEMENT ic release; distribut	ion unlimited				
			11. SPONSOR/MONITOR'S REPORT NUMBER(S)			
9. SPONSORING/MONITORING AGENCY NAME(S) AND ADDRESS(ES)				10. SPONSOR/MONITOR'S ACRONYM(S)		
	ZATION NAME(S) AND AI Accountability Offic C,20548	` '		8. PERFORMING REPORT NUMB	G ORGANIZATION ER	
				5f. WORK UNIT NUMBER		
				5e. TASK NUMBER		
6. AUTHOR(S)					5d. PROJECT NUMBER	
Comprehensive Plan					5c. PROGRAM ELEMENT NUMBER	
Improvement Continues in DOD's Reporting on Sustainable Ranges, but Opportunities Exist to Improve Its Range Assessments and					5b. GRANT NUMBER	
4. TITLE AND SUBTITLE			5a. CONTRACT NUMBER			
1. REPORT DATE 15 DEC 2008		2. REPORT TYPE		3. DATES COVE	ERED 8 to 00-00-2008	
	this burden, to Washington Headquuld be aware that notwithstanding a DMB control number.					

Public reporting burden for the collection of information is estimated to average 1 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information,

**Report Documentation Page** 

Form Approved OMB No. 0704-0188

assessment and evaluation discussed above, (2) goals and milestones for tracking planned actions and measuring progress, (3) projected funding requirements for implementing planned actions, and (4) designation of an office in the Office of the Secretary of Defense (OSD) and in each of the military departments with lead responsibility for overseeing the implementation of the plan. Section 366 further required the Secretary to submit the plan, the results of the assessment and evaluation, and any recommendations that the Secretary may have for legislative or regulatory changes to address training constraints in a report to Congress at the same time that the President submitted the budget for fiscal year 2004. In addition, section 366 required the Secretary to submit a report to Congress annually for fiscal years 2005 through 2013<sup>2</sup> describing the progress made in implementing the 2004 plan and any additional actions taken or to be taken to address training constraints caused by limitations on the use of military land, marine areas, or airspace. Section 366 also required the Secretary to report to Congress, not later than June 30, 2003, on its plans to improve DOD's readiness reporting system to reflect the readiness impact on specific units of the military services due to training constraints caused by limitations on the use of military lands, marine areas, and airspace. Finally, section 366 required the Secretary to (1) develop and maintain an inventory that identifies all available operational training ranges, all training range capacities and capabilities, and any training constraints caused by limitations on the use of military lands, marine areas, and airspace at each training range in fiscal year 2004 and (2) provide an updated inventory to Congress each year for fiscal years 2005 through 2013. The Under Secretary of Defense for Personnel and Readiness issued DOD's fifth annual sustainable ranges report and inventory to Congress on September 18, 2008. Enclosure I contains the text of section 366 of the act.

Section 366(d) of the Bob Stump National Defense Authorization Act for Fiscal Year 2003 requires GAO to submit to Congress an evaluation of DOD's report regarding its training range comprehensive plan and its readiness reporting improvements within 90 days of receiving the report from DOD. We received the report and inventory on September 16, 2008. In 2007, we found that DOD had made improvements to its annual sustainable ranges report, but further improvements could be made.<sup>5</sup>

This is our fifth review in response to our mandate in section 366 of the act. It discusses (1) the extent to which DOD's 2008 sustainable ranges report and training

<sup>&</sup>lt;sup>2</sup> Section 366 originally required reports for fiscal years 2005 through 2008. However, this requirement was extended through 2013 by section 348 of the John Warner National Defense Authorization Act for Fiscal Year 2007, Pub. L. No. 109-364 (2006).

<sup>3</sup> Id.

<sup>&</sup>lt;sup>4</sup> Department of Defense, Office of the Under Secretary of Defense for Personnel and Readiness, *Report to Congress on Sustainable Ranges* (Washington, D.C.: September 2008). This report addresses the progress DOD has made in implementing its sustainable ranges plan and any additional action taken, or to be taken, to address training constraints caused by limitations, and contains an updated training range inventory as well as the elements of section 366 that were required to be in DOD's original fiscal year 2004 report and inventory.

<sup>&</sup>lt;sup>5</sup> GAO, Improvement Continues in DOD's Reporting on Sustainable Ranges, but Opportunities Exist to Improve Its Range Assessments and Comprehensive Plan, GAO-08-10R (Washington, D.C.: Oct. 11, 2007).

<sup>&</sup>lt;sup>6</sup> GAO was not specifically required by section 366 to review DOD's training range inventory. However, because DOD submits this inventory with its sustainable ranges report, we elected to review DOD's training inventory, as we have done in past years.

range inventory address the elements of section 366 and (2) opportunities for DOD to further improve its sustainable ranges report.

Because DOD has addressed most of the elements of section 366 that were to be addressed in its fiscal year 2004 report, as well as the recommendations we included in our 2007 assessment, we focused our review on summarizing the changes made to DOD's sustainable ranges report in addressing these elements and recommendations and on identifying opportunities for improving DOD's report to make it more useful to Congress and other interested parties. To determine the extent to which DOD's 2008 sustainable ranges report and training range inventory address the elements of section 366 that were required to be in DOD's original fiscal year 2004 plan, we reviewed the report and inventory and met with DOD and service officials to discuss them. We discussed challenges DOD faced in meeting the congressionally mandated requirements in fiscal year 2004—and continues to face—and changes in the report and inventory since 2007. We also compared the report and training range inventory to the criteria in section 366 of the National Defense Authorization Act for Fiscal Year 2003 to determine the extent to which this year's report addresses the elements of section 366 that were required to be in DOD's original fiscal year 2004 plan. To identify opportunities for DOD to improve its comprehensive plan within the sustainable ranges report, we compared the 2008 report with elements of the comprehensive plan required by section 366. We also compared DOD's 2008 report and training range inventory to prior DOD and GAO reports. In addition, we reviewed this year's report to determine if DOD addressed the recommendations we included in our 2007 report. To determine the progress that the services have made in their initiatives to sustain their training ranges, we met with service officials about their inputs to DOD's 2008 sustainable ranges report and inventory, key initiatives they have undertaken to address range sustainment, challenges in addressing range sustainment and encroachment issues, and progress or changes since we last reported. The objective of this engagement was to determine the extent to which DOD's sustainable ranges report addressed the elements of section 366, not to comprehensively evaluate the data presented in the report. We conducted this performance audit from August 2008 through December 2008 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

### **Results in Brief**

DOD continues to make progress in addressing most of the elements of section 366. This year's report describes the progress DOD has made in implementing its range sustainment plan, as required by section 366. Further, DOD's 2008 sustainable ranges report has made progress in addressing the elements of section 366 required for DOD's original fiscal year 2004 report, but the report does not fully address three of these elements. The report updates improvements made in addressing four elements of the act required for DOD's fiscal year 2004 report: (1) the evaluation of the adequacy of resources to meet current and future requirements; (2) DOD's goals and milestones for tracking planned actions and measuring progress; (3) designation of offices within OSD and the military departments that are responsible for overseeing

the implementation of DOD's sustainable ranges comprehensive plan; and (4) DOD's plans to improve its readiness reporting system. To address the adequacy of its current resources to meet current and future requirements, DOD established standardized criteria and identified common factors to assess range capabilities and encroachment, as we recommended in our 2007 report. DOD officials said that they worked closely with service officials to build a common set of capability attributes and encroachment factors and service-specific mission areas to evaluate them against. In addition, for the first time, DOD's sustainable ranges report also includes three elements of section 366 required to be included in DOD's fiscal year 2004 report: (1) an assessment of current and future training range requirements, (2) an evaluation of virtual and constructive assets to meet range requirements, and (3) projected funding requirements for implementing planned range sustainability actions. On the other hand, the report did not put forth any recommendations that the Secretary may have for legislative or regulatory changes to address training constraints, nor did it explain the omission. Additionally, while DOD did not identify training constraints caused by limitations on the use of military lands, marine areas, and airspace for each of its ranges, it included an assessment of such constraints on its major training ranges. As in prior years, DOD officials told us that the large volume of data required to identify capacities, capabilities, and constraints on all of its ranges makes doing so impractical. Finally, DOD did not provide proposals to enhance training range capabilities or address any shortfalls in its resources identified pursuant to the assessment and evaluation under Section 366(a)(2), although each of the services has assessed their current resources to meet current and future requirements, which has allowed them to determine their shortfalls in resources.

Although DOD has made progress in addressing elements of section 366, opportunities exist to provide additional information in support of its sustainable ranges report. For example, although each of the services identified the training ranges that would be assessed and conducted an assessment of these ranges. DOD's 2008 report does not provide a rationale for excluding some of its ranges. Including this information would have clarified the process used to determine which ranges would be assessed. In addition, DOD included standardized criteria and common factors for assessing the adequacy of current DOD resources to meet current and future requirements, but the Marine Corps deviated from the approach used by the other services to define its mission areas. The Marine Corps assessed how its range capabilities and encroachment factors impact a unit's ability to complete training, rather than assessing how specific mission training tasks are affected, although benefits may exist from identifying impacts at the unit level. This approach makes it difficult to know which specific Marine Corps training tasks are impacted and thus also difficult to determine where resources should be allocated to improve the Marine Corps range sustainment program. Furthermore, although DOD established goals and milestones for tracking planned actions and measuring progress for four critical range sustainment areas, one of these goals has not been updated. Since 2006, DOD has continued to duplicate the stated goal for operations and maintenance as the modernization and investment goal in its sustainable ranges reports. Additionally,

<sup>7</sup> GAO-08-10R.

<sup>&</sup>lt;sup>8</sup> DOD describes virtual training as training involving real people operating simulated systems. Constructive training is training involving the use of simulated personnel operating simulated equipment in a computer-game-style training environment.

for the past 2 years, the Air Force deviated from the approach used by the other services and did not update its actions to support DOD's modernization and investment goal. Without the annual updates, Congress has less visibility of the progress made toward achieving this goal. Finally, although this is the first year that DOD's sustainable ranges report has included projected funding requirements for implementing planned actions related to its range sustainability efforts. DOD's report does not identify the specific funding elements that each service included to determine its projected funding requirements. DOD expects to refine the collection and presentation of this information in future reports. In the meantime, without including the detailed funding elements for each service in the report, DOD limits congressional visibility over the services' actual range sustainment costs. We are making recommendations designed to improve the content of the sustainable ranges report. In commenting on a draft of this report, DOD concurred with three of our recommendations and did not concur with one recommendation. We discuss DOD's comments later in this report. DOD also provided technical comments on a draft of this report, which we have incorporated where appropriate.

## DOD Continues to Make Progress in Addressing Most Section 366 Elements

DOD has made progress in addressing most of the elements included in section 366 of the Bob Stump National Defense Authorization Act for Fiscal Year 2003. DOD's 2008 sustainable ranges report and inventory is responsive to the requirement that DOD describe the progress made in implementing its sustainable ranges plan and any additional action taken, or to be taken, to address training constraints caused by limitations on the use of military lands, marine areas, and airspace. The report also includes improvements to its standardized criteria and common factors for assessing the adequacy of current DOD resources to meet current and future requirements, as we recommended in our report last year; updates to the designated lead offices within DOD and the services that are responsible for implementing DOD's range sustainment plan; and an update on the status of its readiness reporting system. In addition, this year's report includes four elements of section 366 that were required to be included in DOD's fiscal year 2004 report, but have not been captured in prior years' reports. However, this year's report does not include any recommendations the Secretary may have for legislative or regulatory changes to address training constraints, nor did DOD assess the training constraints on all of its training ranges. Additionally, DOD's report did not provide proposals to enhance training range capabilities or address any shortfalls in its resources identified pursuant to the assessment and evaluation under Section 366(a)(2).

# <u>DOD's Sustainable Ranges Report Describes the Progress Made in Implementing Its</u> Range Sustainment Plan

Rather than revisiting the details of many of the sustainable range initiatives discussed in previous reports, DOD's 2008 report provides an update on the continued progress being made in implementing the range sustainment plan, and any additional actions it has taken or plans to take to address training constraints caused by limitations on the use of military lands, marine areas, and airspace, as required by section 366(a)(5). According to DOD, its 2008 report differs in structure and format from previous reports in that it represents an update to DOD's previous four reports, builds on previous DOD submissions on its range sustainment activities, and serves

as a baseline for future reports. In this report DOD reestablishes the baseline for future reports by (1) analyzing program element data, such as the comprehensive range inventory; (2) assessing progress made in implementing goals and actions; (3) applying new standardized methods for assessing range capabilities and encroachment impacts; (4) addressing funding requirements associated with implementing range sustainability initiatives; and (5) identifying new program directions, priorities, and management initiatives. Furthermore, DOD's report states that the objective of this new format is to provide Congress with a concise and consistent report that highlights the continued evolution of the sustainable ranges initiative and allows progress against section 366 reporting requirements to be easily determined.

# <u>DOD Has Continued to Make Improvements in Addressing Four Other Elements of Section 366</u>

Over the last few years DOD has continued to make improvements in addressing and updating its responses to four other elements of section 366 required in DOD's fiscal year 2004 report. These elements include: (1) DOD's evaluation of the adequacy of resources to meet current and future requirements, (2) updates to DOD's goals and milestones for tracking planned actions measuring progress, (3) an updated list of the designated offices within OSD and the military departments that have lead responsibility for overseeing the implementation of DOD's sustainable ranges comprehensive plan, and (4) DOD's plans to improve its defense readiness reporting system to reflect the readiness impact that training range constraints have on its operational forces.

## Adequacy of Current Resources to Meet Current and Future Requirements

Like last year's report, DOD's 2008 report includes an evaluation of the adequacy of each service's current resources to meet current and future training range requirements, including military lands, marine areas, and airspace available in the United States and overseas. In our 2007 report, we recommended that DOD establish standardized criteria and identify the common factors it used in assessing the adequacy of current DOD resources to meet current and future requirements. DOD concurred and incorporated our recommendation in its evaluation by assessing a given range's ability to support assigned missions areas using 13 common capability attributes and 12 common encroachment factors. According to DOD officials, they worked closely with service officials to build a common set of capability attributes and encroachment factors and service-specific mission areas to evaluate them against. DOD's evaluation includes an assessment of range capabilities and the encroachment factors—such as noise restrictions or endangered species restrictions—that constrain training ranges. These assessments are presented in table format and rated with red, yellow, and green scores to convey the severity of the impacts caused by shortfalls in required capabilities to meet current and future requirements. For example, the Army assessed land shortages at Fort Campbell, Kentucky; Fort Carson/Pinon Canyon Maneuver Site, Colorado; Fort Drum, New York; Fort Hood, Texas; and Fort Riley, Kansas as severely affecting its overall mission, while it considered shortfalls in available targets to have only a minimal

-

<sup>&</sup>lt;sup>9</sup> GAO-08-10R.

impact. Establishing these criteria provides DOD with a consistent approach for reporting the impact that range sustainment has on DOD units across all services. Each military service used a doctrinal approach to identify its mission areas as standard criteria for assessing range capabilities and the impact of various encroachment factors.

Goals and Milestones for Tracking Planned Actions and Measuring Progress

In 2005, DOD established goals and milestones for tracking planned actions and measuring progress in four critical range sustainment areas—modernization and investment, operations and maintenance, environment, and encroachment. For each goal, actions and milestones have been identified for fulfillment during fiscal years 2005 through 2011. The stated goals for each of these critical sustainment areas are as follows:

- Modernization and Investment: Sustain range operations in accordance with OSD and service training transformation strategies by resourcing advanced instrumentation and other infrastructure.
- Operations and Maintenance: Provide resources for standardized land management structure and operations that mitigate encroachment and provide for range sustainment. Maximize and sustain the availability of military range infrastructure and land assets.
- Environment: Focus the environmental management systems to fully support sustained required access to ranges.
- Encroachment: Maximize the accessibility of DOD ranges by minimizing restrictions brought about by encroachment factors. Implement sustainment outreach efforts that will improve public understanding of DOD requirements for training and testing, and support coalition-building and partnering on range sustainment issues important to DOD readiness.

According to DOD, this common framework of goals and milestones has enabled DOD and the services to make meaningful comparisons and measurements of past performance and progress toward both near- and long-term objectives. DOD's 2008 report provided updates, as necessary, to actions taken by the services in response to the four goals and milestones.

Designation of Lead Offices Responsible for Overseeing Implementation of Range Sustainability Plan

This year's report provides an update to the informational table presented in DOD's 2004 report that identifies the offices within OSD and the military departments that have lead responsibility for overseeing the implementation of DOD's comprehensive range sustainability plan. DOD's 2008 report not only provides the new organizational names for some of the responsible offices, but for the Navy, it also identifies offices that were not previously included in DOD's 2004 report. Table 1 identifies the responsible offices within the Office of the Secretary of Defense and the military services.

Table 1: Responsible Training Range Offices within OSD and the Military Services

Organization	Office with designated responsibility
Office of the Secretary of Defense (OSD)	Office of the Deputy Under Secretary of Defense
	(Personnel & Readiness) OUSD(P&R)
	Director, Military Training, and Sustainable
	Ranges
	Office of the Deputy Under Secretary of Defense
	(Readiness)
Air Force	Deputy Chief of Staff for Operations, Plans, and
	Requirements
	Director of Current Operations and Training
	Ranges and Airspace Division, HQ USAF
	(Headquarters United States Air Force)/A30-AR
Army	Office of the Deputy Chief of Staff, G-3/5/7
	Training Directorate
	Training Support Systems Division (DAMO-TRS)
Navy	Office of the Chief of Naval Operations, Materiel
	Readiness, and Logistics (N4)
	Fleet Readiness Division (N43)
	Range Modernization and Investment (N433) and
	Range Operations and Maintenance (N433)
	Environmental Readiness Division (N45)
	Operational and Environmental Readiness
	Planning Branch (N456)
	Commander, Naval Installations Command
	(CNIC)/Ashore Readiness Division (N46)
Marine Corps	Commanding General, Training, and Education
•	Command
	Range and Training Area Management Division
	Range Modernization & Investment
	Range Operations & Maintenance
	Deputy Commandant for Installations and Logistics
	Facilities and Services Division
	Environmental
	Encroachment
G DOD! 2000 D ++ G - G +	

Source: DOD's 2008 Report to Congress on Sustainable Ranges (September 2008).

#### Readiness Reporting Improvements

Although DOD has not finalized its plans to incorporate a range readiness component into its new Defense Readiness Reporting System, it has made progress in establishing the framework for this initiative. DOD stated in its 2008 sustainable ranges report that it plans to establish a component within the Defense Readiness Reporting System that will report "range as a resource" for supporting a military mission. In its report, DOD stated that efforts are under way to design the model to be used for reporting range readiness through its readiness reporting system. DOD officials also told us that the department will conduct a pilot test over the next several months to validate its concept for managing the data necessary to support this system. DOD stated in its report that this pilot test will form the basis of the functional requirements to build the initial range readiness pages into the new

readiness reporting system. According to DOD officials, funding for the pilot has been approved and the pilot is expected to implement the assessment framework outlined in DOD's 2008 report. Additionally, DOD officials stated that this pilot test will accomplish the first phase of a two-phased implementation plan for reporting range readiness in Defense Readiness Reporting System implementation. The objective of the second phase will be to link readiness assessments from units and their associated mission-essential tasks and assessments from an installation's functional requirements to the range assessment framework. In response to a direction from the House Armed Services Committee Report on the 2009 National Defense Authorization Act, DOD is planning to present the results of the pilot test in a report to the committee in March 2009. The report will include information on how encroachment affects the training and readiness levels of tactical units.

DOD's 2008 Sustainable Ranges Report Addresses Three Elements of Section 366 That Were Not Included In Previous Reports

DOD's 2008 sustainable ranges report includes three elements that were not included in prior reports: (1) an assessment of the current and future training requirements of the armed forces; (2) a description of virtual and constructive training assets used to provide realistic training events that help to meet DOD training requirements and (3) projected funding requirements associated with implementing planned actions.

Assessment of Current and Future Training Range Requirements

Section 366 required DOD to provide an assessment of current and future requirements in its fiscal year 2004 report. To address this element of Section 366, DOD's 2008 sustainable ranges report emphasized describing the processes used by each of the services to derive its current and future training range requirements. With respect to current training requirements, DOD's report states that each of the services maintains a comprehensive set of processes specific to its mission and command structure and that these processes are used to develop, document, and execute training objectives and requirements. Additionally, the report states that DOD groups its future requirements into two categories: near term and long term. According to DOD, near-term requirements can be assessed with some degree of accuracy, because the services can reasonably anticipate the near-term strategic environment, operating concepts, and technological capabilities. However, assessing long-term requirements is significantly more challenging, because there is greater uncertainty surrounding these factors.

DOD's 2008 report states that each of the services has developed a framework for determining its current and future training requirements. Although the frameworks all have similarities, each service's framework is unique, and each includes an assessment of the national security and military strategies of the United States, guidance for the development and employment of forces, the Universal Joint Task List and Combatant Commander assigned Mission Essential Tasks, and lessons learned from previous training evaluations, among other things. The strategies for assessing service training requirements can also be found in a variety of DOD publications, doctrinal reports, and guidance documents.

\_

<sup>&</sup>lt;sup>10</sup> H.R. Rep. No. 110-652, at 331 (2008).

### Live, Virtual, and Constructive Training Strategy

Unlike prior reports, this year's report also includes an evaluation of virtual and constructive training assets to meet current and future training range requirements. The overview of DOD's live, virtual, and constructive training strategy included in this year's report outlines the role this training strategy plays in providing what DOD believes is realistic, comprehensive, and cost-effective training. DOD stated that this type of training cannot replace live training, but it can supplement and enhance live training to sustain proficiency. DOD stated in its 2008 report that live, virtual, and constructive training and other related departmental science and technology initiatives will greatly increase the capabilities and interoperability of the virtual training environment. According to DOD, when its live, virtual, and constructive training network is fully operational, it will provide commanders with immediate access to a global communications, experimentation, testing, and education network that will enable units to train effectively at an affordable cost from geographically dispersed locations. Additionally, DOD stated that in November 2007 it successfully conducted an integrated live, virtual, and constructive training proof-of-concept demonstration. The demonstration used existing technologies to network an F-15E aircraft (live) with an F-15E simulator (virtual), while integrating computer-generated threats (constructive) into both environments. The live aircraft and the manned F-15E simulator, operating as a wingman, targeted and destroyed the simulated threats that appeared on their respective radar displays. The progress gained from this proof of concept will help DOD move forward on designing and building a more robust training component.

#### **Projected Funding Requirements**

Section 366 required DOD's fiscal year 2004 report to include projected funding requirements for implementing planned actions related to its range sustainability effort. We have consistently reported that DOD failed to provide such funding requirements in prior reports. However, this year marks the first time DOD has included funding information in its sustainable ranges report. In an attempt to develop a common framework across the services for consistently and accurately reporting range sustainment funding, a sustainable ranges funding subgroup was formed in 2004 to examine funding strategies and categories used by the services for their training range sustainability efforts. In this year's report, DOD included four main categories, established by the funding subgroup, as a common starting point from which to report training range sustainment funding data: (1) modernization and investment, (2) operations and maintenance, (3) environment, and (4) encroachment. DOD stated in its report that these categories serve as an initial framework being explored by DOD and the services to track, report, and project the need for future fiscal resources to support range sustainment. Table 2 displays the estimated range sustainment funding for fiscal years 2008 and 2009 for each service that was included in DOD's 2008 report.

Table 2: Service Training Range Sustainment Funding (dollars in millions)<sup>a</sup>

Service	Fiscal year	
Air Force	2008	2009
Modernization & Investment	\$60.4	\$62.0
Operations and Maintenance	\$197.6	\$205.7
Environmental	\$31.8	\$23.9
Encroachment	$$6.67^{\circ}$	N/A
Air Force Total	\$296.4	\$301.6
Army		
Modernization & Investment	\$321.5	\$339.3
Operations and Maintenance	\$217.8	\$293.5
Environmental	\$78.0	\$84.5
Encroachment	\$129.2	\$137.3
Army Total	\$807.0	\$914.5
Marine Corps		
Modernization & Investment	\$25.5	\$53.2
Operations and Maintenance	$$33.7^{\circ}$	$$42.6^{\circ}$
Environmental	\$5.7	\$5.7
Encroachment	\$5.0	\$5.0
Marine Corps Total	\$69.9	\$106.4
Navy		
Modernization & Investment	\$85.0	\$93.0
Operations and Maintenance	\$174.2	\$177.9
Environmental	\$12.3	\$10.0
Encroachment	\$8.0	\$11.0
Navy Total	\$279.5	\$291.7
All Services	FY 2008	FY 2009
Service Total	\$1,452.8	\$1,614.2

Source: DOD's 2008 Report to Congress on Sustainable Ranges (September 2008).

This first attempt to summarize range sustainment funding data is an important step toward determining the adequacy of existing range sustainment resources.

<u>DOD's Sustainable Ranges Report Still Does Not Fully Address Three Elements of Section 366 That Were Required To Be Included in DOD's Original Fiscal Year 2004 Report and Inventory</u>

Although DOD's 2008 sustainable ranges report addresses most of the elements of section 366 that were required for DOD's original fiscal year 2004 report and inventory, it still does not include any recommendations the Secretary may have for legislative or regulatory changes to address training constraints, and DOD still has

Totals may not add due to rounding.

<sup>&</sup>lt;sup>a</sup>Range clearance funds are part of a program objective memorandum 2010 initiative.

<sup>&</sup>lt;sup>b</sup> Estimated value.

<sup>&</sup>lt;sup>c</sup>Funds for real property maintenance and funds provided via base operating support are not included as these programs are centrally managed and breakouts to range-specific expenditures were not available.

not assessed the training constraints on all of its training ranges. Additionally, DOD's report does not provide proposals to enhance training range capabilities or address any shortfalls in its resources identified pursuant to the assessment and evaluation under Section 366(a)(2).

## Recommendations for Legislative or Regulatory Changes

In last year's report, DOD provided an explanation of its decision not to include any new recommendations for legislative or regulatory changes, but did not include such an explanation in this year's report. However, DOD's 2008 report does include a detailed overview of the legislative and regulatory initiatives that it has previously submitted to Congress, including approved exemptions from the Migratory Bird Treaty Act, the Endangered Species Act, and the Marine Mammal Protection Act, as well as previous recommendations to obtain exemptions from the Clean Air Act, the Resource Conservation and Recovery Act, and the Comprehensive Environmental Response Compensation and Liability Act that have not been approved. DOD's report also includes a discussion of specific state- and service-level legislative initiatives designed to alleviate some of the constraints placed on the military's ability to train. DOD officials told us that they do not have any plans to amend DOD's existing process for submitting requests for legislative language.

## **Training Range Inventories**

Although DOD did not identify all training constraints caused by limitations on the use of military lands, marine areas, and airspace for all of its ranges, as required in DOD's fiscal year 2004 inventory, it included an assessment of such constraints on its major training ranges in its 2008 report. As in prior years, DOD officials reported that it was impractical to complete an assessment for every training range in its inventory due to the large volume of data that would be required to identify capacities, capabilities, and constraints within its inventory. However, Appendix C of DOD's 2008 report does include a comprehensive listing of all operational training ranges and the capacities and capabilities available at each training range. For each range complex in DOD's training and testing inventory, DOD identifies the capacity of a range based on range description (land area for ranges, special-use airspace, sea surface area, and underwater tracking area) and the various types of capabilities that the range supports—such as air to air/surface to air, air to ground, land maneuver, land impact area, land firing range, amphibious area, ocean operating area, and underwater tracking.

<sup>&</sup>lt;sup>11</sup> In it s 2007 report, DOD stated that there was an existing process by which DOD must submit all requests for legislative language that includes, among other things, obtaining approval from DOD's Office of Legislative Affairs and Office of Management and Budget, and that the deadline for this process is the same as the deadline for the sustainable ranges report.

<sup>&</sup>lt;sup>12</sup> GAO, Military Training: Compliance with Environmental Laws Affects Some Training Activities, but DOD Has Not Made a Sound Business Case for Additional Environmental Exemptions, GAO-08-407 (Washington, D.C.: Mar. 7, 2008).

DOD Did Not Provide Proposals to Enhance Training Range Capabilities or Address Any Shortfalls in Its Resources

As mentioned earlier, each of the services has assessed the adequacy of its current resources to meet current and future requirements, which has allowed them to determine their shortfalls in resources. However, DOD's 2008 report does not provide proposals to enhance training range capabilities or address any shortfalls in its resources identified pursuant to the assessment and evaluation under Section 366(a)(2), as required for DOD's fiscal year 2004 report. As a part of this assessment, each service identified its most prominent shortfalls and encroachment factors across all of its ranges. Some of the range capability attributes that resulted in shortfalls include land space, scoring and feedback system, threats, targets, and infrastructure. Additionally, some of the encroachment factors contributing to training range constraints included air quality, spectrum, wetlands, adjacent land use, and threatened and endangered species. According to DOD, the relationship between encroachment and capability is an emerging concept that will be further developed in future reports. Furthermore, DOD's 2008 report concludes that the capabilities and encroachment data can be used by decision makers, planners, and analyst to develop strategies to (1) mitigate range and training area shortfalls, (2) bring required capabilities up to standards, and (3) address negative impacts from encroachment. However, proposed strategies for addressing these issues were not included in DOD's report.

## Opportunities Exist to Further Improve DOD's Range Sustainability Plan

Opportunities exist for DOD to further improve its comprehensive range sustainability plan by including additional information in its responses to three elements of section 366: (1) adequacy of current resources to meet current and future training requirements, (2) goals and milestones for tracking planned actions and measuring progress, and (3) projected funding requirements for implementing planned actions.

DOD's Assessment of the Adequacy of Its Resources Does Not Include the Services' Rationales for Excluding Some Ranges in Their Evaluations

DOD's assessment of the adequacy of its resources does not include the services' rationales for excluding some ranges from their evaluations. According to DOD officials, the overall range capability and encroachment assessments included in DOD's 2008 sustainable ranges report are fairly accurate, based on available data, and vetted through multiple offices within DOD and the services in order to decrease the level of subjectivity. To guide the services through the assessment process DOD provided a reporting structure and definitions of each rating category. Each of the services identified the training ranges that it would assess and conducted assessments of these ranges, followed by confirmation of the final assessments by the headquarters of each service. However DOD's 2008 report does not provide an explanation of why each service excluded certain training ranges from its range capabilities and encroachment assessment. For example, the Army assessed only 14 of the more than 10,000 training ranges located on its 479 installations, while the Air Force excluded 6 of its 41 ranges, the Marine Corps excluded 5 of its 14 ranges, and the Navy excluded 1 of its 23 ranges. Although the Air Force, Navy, and Marine Corps

excluded only a small percentage of their ranges from their range capabilities and encroachment assessments, they did not explain the omissions. According to DOD and Army officials, the 14 ranges included in the Army's analysis represent Army Tier One installations and these Tier One installations support home station tasks for 88 percent of the Army's active component combat brigades. Furthermore, DOD reported to us that although the services did not provide rationale for excluding some of their ranges, the included ranges represented a significant percentage of the service's total range acreage, with the exception of the Army. For example, while the Army assessed only 30 percent of its total range acreage, the Marine Corps assessed 97.6 percent, the Air Force assessed 99.6 percent, and the Navy assessed 100 percent of their total range acreages. Additionally, DOD and service officials told us that the assessments included in DOD's 2008 report represented all of their major training ranges. DOD officials also stated that the services chose not to include assessments of all ranges because of the infrequent use and limited scope of some of the ranges. However, these explanations were not included in DOD's 2008 report. Consequently, DOD and the services missed an opportunity to provide more clarity to the process they used to determine which ranges would be assessed.

<u>The Marine Corps Deviated from the Approach Used by the Other Services to Define Its Mission Areas When Evaluating the Adequacy of Its Resources</u>

Although DOD has established standard criteria for reporting the factors affecting its training ranges, our review of DOD's report found that the Marine Corps deviated from the approach used by the other services in defining its mission areas. Instead of assessing how a range's capability and encroachment factors impact specific mission training tasks—the approach used by the other services—the Marine Corps assessed how these factors impact an entire unit's ability to conduct training. The Marine Corps executes its national security missions through the Marine Air-Ground Task Force concept. Organized for specific missions, the task force has a standard structure consisting of four basic combat elements: command, aviation combat, ground combat, and logistics command. Instead of identifying these basic combat elements as the mission areas for assessing its ranges' capabilities and the impact of encroachment on those mission areas, the Marine Corps conducted its assessment using individual, unit, and Marine Air Ground Task Force expeditionary-level training<sup>13</sup> as its mission areas. Although there may be benefits from identifying impacts at the unit level, this approach makes it difficult to know which specific Marine Corps training tasks are impacted. Although DOD officials said the Marine Corps' approach is acceptable, it is inconsistent with the other services' approach, and it may also make it difficult to determine where resources should be allocated to improve the Marine Corps range sustainment program.

### One of DOD's Goals and Milestones Was Not Updated

Each year DOD requires the services to provide updates on actions they have taken to address DOD's four goals and milestones for its critical range sustainment areas—modernization and investment, operations and maintenance, environment, and encroachment; one of these goals was not updated. As mentioned earlier, according

-

<sup>&</sup>lt;sup>13</sup> Marine Air Ground Task Force expeditionary-level training includes unit-level and brigade-level training.

to DOD's 2005 report, the goal for modernization and investment is to sustain range operations in accordance with OSD and the services-level training transformation strategies by resourcing advanced instrumentation and other infrastructure. Since 2006, DOD has continued to duplicate the stated goal for operations and maintenance (resource for standardized land management structure and operations that mitigate encroachment and provide for range sustainment and maximize and sustain the availability of military range infrastructure and land assets) as the modernization and investment goal in its sustainable ranges report. Additionally, with respect to actions taken by the services to address DOD's modernization and investment goal, we found that the Air Force has not identified any actions in support of DOD's modernization and investment goal since it provided a progress report in DOD's 2006 report, whereas the other services reported on their progress in addressing actions related to this objective. For example, the Army, Navy, and Marine Corps reported updates to their efforts to (1) develop and annually update their range complex plans and (2) identify and document management processes for determining range requirements. In DOD's 2006 report, the Air Force stated that it was in the process of developing templates for standardizing its range complex plans across its ranges. To date, the Air Force has not provided any additional information regarding the progress it has made in developing its range complex plans, nor has it reported its progress regarding any other actions DOD prescribed for addressing this goal. According to Air Force officials, the Air Force did not provide updated information to DOD for inclusion in its 2008 report because the Air Force has not taken any additional actions with respect to this goal. Unless the services provide annual updates regardless of whether they have taken any additional action on this DOD initiative, Congress has no visibility over the progress they have made toward achieving this goal.

## Projected Funding Requirements Do Not Provide Details on Funding Categories

This year's report is the first to include funding information; however, the accuracy of DOD's projected funding requirements can be improved. DOD has acknowledged in previous reports that it faces several challenges in addressing this requirement, because funding is managed differently by each service, and costs are spread across multiple funding categories. In its 2008 report, DOD provided guidance to the services by providing general descriptions of the various initiatives that should be included in each of the four range sustainability funding categories—modernization and investment, operations and maintenance, environment, and encroachment. However, in identifying projected funding requirements for each service, DOD's report does not provide a description of the funding data included in each of the four main categories. Furthermore, because the report does not provide this description, Congress has limited visibility over the specific content of each service's costs for range sustainment. According to DOD officials, the department expects to further refine how it collects and presents this information in future reports. DOD officials have initiated a study aimed at determining all of the funding elements included in DOD's range sustainment efforts, and they plan to use the results of this study to provide a more accurate view of funding for range sustainment in future reports. As DOD continues to refine its funding requirements in its future reports, the inclusion of specific details that comprise the cost associated with each funding category would help provide visibility to DOD and Congress of all sustainable range costs, including those costs that may be centrally managed. For example, the costs associated with range operations on an installation that may be centrally managed, such as real

property maintenance, range operations, or related base operating costs, have not been included in each service's projected funding requirements. The inclusion of this information would also provide Congress and others with the necessary details to understand the funding estimates that support the cost of managing DOD's range sustainment.

#### Conclusions

DOD has continued to improve its annual sustainable ranges report over the past few vears. DOD's 2008 sustainable ranges report continues the trend and the report and its updated training range inventory address the mandated requirement to describe the progress made in implementing DOD's sustainable ranges plan and any additional action taken, or to be taken, to address training constraints. DOD's annual sustainable ranges report has also adequately addressed most of the elements of section 366 that were required to be in DOD's original fiscal year 2004 report and inventory, with the exception of providing recommendations the Secretary may have for legislative or regulatory changes, and not assessing all of its ranges for training constraints caused by limitations on the use of military lands, marine areas, and airspace. Additionally, DOD's report did not provide proposals to enhance training range capabilities or address any shortfalls in its resources identified pursuant to the assessment and evaluation under Section 366(a)(2). However, opportunities exist for DOD to continue to improve its report to make it more useful to Congress and other interested parties in coming years. For example, DOD could provide more clarity in its rationale for determining which ranges will be assessed. Furthermore, as DOD continues to evaluate the adequacy of its resources, the use of a consistent approach to define the Marine Corps mission areas for assessing range capability and encroachment would make it easier to identify which Marine Corps training tasks are impacted and where resources should be allocated. Additionally, DOD's sustainable ranges report could be improved by requiring the Air Force to update actions it has taken to address DOD's modernization and investment goal. Lastly, as DOD continues to refine its funding requirements in future reports, having a detailed description of all funding data included in each category would provide Congress and others with visibility of all costs, including the necessary details to understand the funding estimates that support the cost of managing DOD's range sustainment.

#### **Recommendations for Executive Action**

To improve the range requirements and capabilities assessments and future comprehensive plans within the sustainable ranges reports, we recommend that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness, in consultation with the Secretaries of the military departments, to include the following four items in future sustainable ranges reports:

- each service's rationale for excluding training ranges from its assessment of the adequacy of current resources to meet requirements,
- the Marine Corps' individual combat training elements as the mission areas in the range capability and encroachment assessment,
- an update on the actions taken by the Air Force to address DOD's modernization and investment goals for range sustainment, and

• a detailed description of all funding data included in each funding category, for each of the military services.

## **Agency Comments and Our Evaluation**

In written comments on a draft of this report, the Deputy Under Secretary of Defense for Readiness concurred with three of our recommendations and indicated that actions will be taken in future reports to address them. DOD did not concur with our recommendation to include the Marine Corps' individual combat training elements as the mission areas in the range capability and encroachment assessment in future sustainable ranges reports. DOD stated that the Marine Corps' approach for assessing range capability and encroachment is consistent with the methodologies the Marine Corps uses to manage and resource its ranges. In addition, DOD stated that the levels of training displayed in the range capability and encroachment assessment charts are based on established training tasks.

Although we recognize and commend DOD for establishing standard criteria for reporting the factors affecting its training ranges, the mission areas used by the Marine Corps may not provide Congress with the information needed to determine the specific training elements impacted by a range's capability attributes or encroachment factors. Additionally, the approach used by the Marine Corps is inconsistent with the other services' approach to identifying their mission areas. The purpose of the range capability and encroachment assessments charts in the 2008 sustainable ranges report is to help DOD identify mission areas inhibited by a range's inability to support specific training activities and consistency in presentation across all of the services enhances this understanding. While we recognize that the Marine Corps chose to display its mission areas based on established training tasks and this approach is consistent with its doctrine, we believe that providing additional information identifying the individual training elements that comprise the levels of training on the Marine Corps training continuum would provide Congress with more insight into which specific Marine Corps training elements are impacted by a range's inability to adequately support their training missions. Given that a Marine expeditionary unit has a standard structure consisting of four basic combat elements—command, aviation combat, ground combat, and logistics command—we believe that presenting the elements or mission-specific tasks related to the four elements in the Marine Corps range capability and encroachment assessments would be much more useful. For example, instead of simply listing the Marine Expeditionary Unit (MEU) as a mission area, the Marine Corps could list the specific training activities that the MEU performs, such as fire support, aviation, or logistics. Listing these elements as mission areas would provide Congress and other interested parties with the additional information necessary to address and potentially fund the specific areas of training deemed not fully mission capable. Consequently, we continue to believe that our recommendation is valid. Furthermore, during our discussions with Marine Corps officials, they stated that they have the ability to provide this type of information if Congress or others required such detailed information. Nothing in our recommendation prevents the Marine Corps from presenting the information both ways. Consequently, we stand by our recommendation.

The Deputy Under Secretary of Defense's comments are reprinted in enclosure II. DOD also provided technical comments, which we have incorporated where appropriate.

----

We are sending copies of this report to the appropriate congressional committees. We are also sending copies to the Secretary of Defense; the Secretaries of the Army, the Navy, and the Air Force; the Commandant of the Marine Corps; and the Director, Office of Management and Budget. In addition, this report will be available at no charge on our Web site at <a href="http://www.gao.gov">http://www.gao.gov</a>. If you or your staff have any questions about this report, please contact me at (202) 512-4523 or leporeb@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in enclosure III.

Brian J. Lepore, Director

Defense Capabilities and Management

## List of Committees

The Honorable Carl Levin Chairman The Honorable John McCain Ranking Member Committee on Armed Services United States Senate

The Honorable Daniel K. Inouye Chairman The Honorable Thad Cochran Ranking Member Subcommittee on Defense Committee on Appropriations United States Senate

The Honorable Ike Skelton Chairman The Honorable Duncan L. Hunter Ranking Member Committee on Armed Services House of Representatives

The Honorable John P. Murtha Chairman The Honorable C. W. Bill Young Ranking Member Subcommittee on Defense Committee on Appropriations House of Representatives

## Section 366 of the Bob Stump National Defense Authorization Act for Fiscal Year 2003

SEC. 366. Training Range Sustainment Plan, Global Status of Resources and Training System, and Training Range Inventory.

- (a) PLAN REQUIRED—(1) The Secretary of Defense shall develop a comprehensive plan for using existing authorities available to the Secretary of Defense and the Secretaries of the military departments to address training constraints caused by limitations on the use of military lands, marine areas, and airspace that are available in the United States and overseas for training of the Armed Forces.
- (2) As part of the preparation of the plan, the Secretary of Defense shall conduct the following:
- (A) An assessment of current and future training range requirements of the Armed Forces.
- (B) An evaluation of the adequacy of current Department of Defense resources (including virtual and constructive training assets as well as military lands, marine areas, and airspace available in the United States and overseas) to meet those current and future training range requirements.
- (3) The plan shall include the following:
- (A) Proposals to enhance training range capabilities and address any shortfalls in current Department of Defense resources identified pursuant to the assessment and evaluation conducted under paragraph (2).
- (B) Goals and milestones for tracking planned actions and measuring progress.
- (C) Projected funding requirements for implementing planned actions.
- (D) Designation of an office in the Office of the Secretary of Defense and in each of the military departments that will have lead responsibility for overseeing implementation of the plan.
- (4) At the same time as the President submits to Congress the budget for fiscal year 2004, the Secretary of Defense shall submit to Congress a report describing the progress made in implementing this subsection, including—
- (A) the plan developed under paragraph (1);
- (B) the results of the assessment and evaluation conducted under paragraph (2); and
- (C) any recommendations that the Secretary may have for legislative or regulatory changes to address training constraints identified pursuant to this section.

- (5) At the same time as the President submits to Congress the budget for each of fiscal years 2005 through 2008, 14 the Secretary shall submit to Congress a report describing the progress made in implementing the plan and any additional actions taken, or to be taken, to address training constraints caused by limitations on the use of military lands, marine areas, and airspace.
- (b) READINESS REPORTING IMPROVEMENT—Not later than June 30, 2003, the Secretary of Defense, using existing measures within the authority of the Secretary, shall submit to Congress a report on the plans of the Department of Defense to improve the Global Status of Resources and Training System to reflect the readiness impact that training constraints caused by limitations on the use of military lands, marine areas, and airspace have on specific units of the Armed Forces.
- (c) TRAINING RANGE INVENTORY—(1) The Secretary of Defense shall develop and maintain a training range inventory for each of the Armed Forces—
- (A) to identify all available operational training ranges:
- (B) to identify all training capacities and capabilities available at each training range: and
- (C) to identify training constraints caused by limitations on the use of military lands, marine areas, and airspace at each training range.
- (2) The Secretary of Defense shall submit an initial inventory to Congress at the same time as the President submits the budget for fiscal year 2004 and shall submit an updated inventory to Congress at the same time as the President submits the budget for fiscal years 2005 through 2008. 15
- (d) GAO EVALUATION—The Secretary of Defense shall transmit copies of each report required by subsections (a) and (b) to the Comptroller General. Within 60 days after receiving a report, the Comptroller General shall submit to Congress an evaluation of the report.<sup>16</sup>

 $<sup>^{14}</sup>$  This requirement was extended through 2013 by section 348 of the John Warner National Defense Authorization Act for Fiscal Year 2007.

<sup>15</sup> Id.

 $<sup>^{16}</sup>$  This requirement was extended to 90 days by section 348 of the John Warner National Defense Authorization Act for Fiscal Year 2007.

### **Comments from the Department of Defense**



# OFFICE OF THE UNDER SECRETARY OF DEFENSE 4000 DEFENSE PENTAGON WASHINGTON, DC 20301-4000

DEC 9 2008

Mr. Brian J. Lepore Director, Defense Capabilities and Management U.S. Government Accountability Office Washington, D.C. 20548

Dear Mr. Lepore:

This is the Department of Defense (DoD) response to the General Accounting Office Draft Report GAO-09-128R, "Improvement Continues in DOD's Reporting on Sustainable Ranges, but Opportunities Exist to Improve its Ranges Assessments and Comprehensive Plan," November 10, 2008.

Thank you for the opportunity to comment on this draft. The DoD appreciates the GAO's assessment of the encroachment challenges facing our nation's military ranges and operating areas and the Department's comprehensive plan to sustain these critical assets. As the GAO observes, we believe that annual reporting to Congress continues to improve over time as the Department's sustainable ranges effort matures.

DoD responses on the specific GAO recommendations are enclosed. We look forward to continuing to work with Congress and the GAO to maintain a ready and sustainable military testing and training infrastructure.

Sincerely,

Samuel D. Kleinman

Deputy Under Secretary of Defense

(Readiness)

Enclosure: As stated



#### **GAO-09-128R DRAFT REPORT**

"Improvement Continues in DOD's Reporting on Sustainable Ranges, but Opportunities Exist to Improve its Ranges Assessments and Comprehensive Plan"

# DEPARTMENT OF DEFENSE COMMENTS TO RECOMMENDATIONS

**RECOMMENDATION 1:** The GAO recommends that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness, in consultation with the Secretaries of the military departments, to include each service's rational for excluding the specific training ranges not included in its assessment of the adequacy of current resources to meet requirements in future sustainable ranges reports.

<u>DOD RESPONSE</u>: Concur, future reports will incorporate rationale as to why some ranges may be included in the inventory, yet not have a capability or encroachment assessment performed.

**RECOMMENDATION 2:** The GAO recommends that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness, in consultation with the Secretaries of the military departments, to include the Marine Corps' individual combat training elements as the mission areas in the range capability and encroachment assessment in future sustainable ranges reports.

DOD RESPONSE: Non-concur, the Marine Corps' approach to assessing range capability and encroachment is consistent with all the source documents and methodologies by which the Marine Corps manages and resources its ranges. The capabilities assessments are designed to measure the ranges' ability to support the levels of training on the Marine Corps training continuum. Those levels of training are all based on established training responsibilities embodied in Marine Corps Tasks (MCTs), which are derived from the Universal Joint Task List and Joint Tactical Tasks. In future reports, they will provide greater explanatory comments on both capabilities and encroachment impacts, but the framework established in their Required Range Capabilities Document (RCD), range complex management plans, and range management orders all support the methodology they have employed in this report.

RECOMMENDATION 3: The GAO recommends that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness, in consultation with the Secretaries of the military departments, to include an update on the actions taken by the Air Force to address DoD's modernization and investment goals for range sustainment in future sustainable ranges reports.

**<u>DOD RESPONSE</u>**: Concur, updates of actions taken by each Service over the preceding year towards completion of goals and milestones will be addressed.

**RECOMMENDATION 4:** The GAO recommends that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness, in consultation with the Secretaries of the military departments, to include a detailed description of all funding data included in each funding category, for each of the military services in future sustainable ranges reports. **<u>DOD RESPONSE</u>**: Concur, OSD will work with the Services to provide a more detailed description of what areas are financed within each of the funding categories.

## **GAO Contact and Staff Acknowledgments**

## **GAO Contact**

Brian Lepore, (202) 512-4523 or <a href="mailto:leporeb@gao.gov">leporeb@gao.gov</a>

## Acknowledgments

In addition to the person named above, Harold Reich, Assistant Director; Jason Jackson; Joanne Landesman; Katherine Lenane; and Jacqueline McColl made key contributions to this report.

#### **Related GAO Products**

Military Training: Compliance with Environmental Laws Affects Some Training Activities, but DOD Has Not Made a Sound Business Case for Additional Environmental Exemptions. GAO-08-407. Washington, D.C.: March 7, 2008.

Improvement Continue in DOD's Reporting on Sustainable Ranges, but Opportunities Exists to Improve Its Range Assessments and Comprehensive Plan. GAO-08-10R. Washington, D.C.: October 11, 2007.

Improvement Continues in DOD's Reporting on Sustainable Ranges, but Additional Time Is Needed to Fully Implement Key Initiatives. GAO-06-725R. Washington, D.C.: June 20, 2006.

Military Training: Funding Requests for Joint Urban Operations Training and Facilities Should Be Based on Sound Strategy and Requirements. GAO-06-193. Washington, D.C.: December 8, 2005.

Some Improvements Have Been Made in DOD's Annual Training Range Reporting but It Still Fails to Fully Address Congressional Requirements. GAO-06-29R. Washington, D.C.: October 25, 2005.

Military Training: Actions Needed to Enhance DOD's Program to Transform Joint Training. GAO-05-548. Washington, D.C.: June 21, 2005.

Military Training: Better Planning and Funding Priority Needed to Improve Conditions of Military Training Ranges. <u>GAO-05-534</u>. Washington, D.C.: June 10, 2005.

Military Training: DOD Report on Training Ranges Does Not Fully Address Congressional Reporting Requirements. <u>GAO-04-608</u>. Washington, D.C.: June 4, 2004.

Military Training: Implementation Strategy Needed to Increase Interagency Management for Endangered Species Affecting Training Ranges. GAO-03-976. Washington, D.C.: September 29, 2003.

Military Training: DOD Approach to Managing Encroachment on Training Ranges Still Evolving. GAO-03-621T. Washington, D.C.: April 2, 2003.

Military Training: DOD Lacks a Comprehensive Plan to Manage Encroachment on Training Ranges. GAO-02-614. Washington, D.C.: June 11, 2002.

Military Training: DOD Needs a Comprehensive Plan to Manage Encroachment on Training Ranges. GAO-02-727T. Washington, D.C.: May 16, 2002.

Military Training: Limitations Exist Overseas but Are Not Reflected in Readiness Reporting. <u>GAO-02-525</u>. Washington, D.C.: April 30, 2002.

(351254)

ſ	This is a work of the LLC government and is not subject to consider materials in the
	This is a work of the U.S. government and is not subject to copyright protection in the United States. The published product may be reproduced and distributed in its entirety without further permission from GAO. However, because this work may contain copyrighted images or other material, permission from the copyright holder may be necessary if you wish to reproduce this material separately.

GAO's Mission	The Government Accountability Office, the audit, evaluation, and investigative arm of Congress, exists to support Congress in meeting its constitutional responsibilities and to help improve the performance and accountability of the federal government for the American people. GAO examines the use of public funds; evaluates federal programs and policies; and provides analyses, recommendations, and other assistance to help Congress make informed oversight, policy, and funding decisions. GAO's commitment to good government is reflected in its core values of accountability, integrity, and reliability.
Obtaining Copies of GAO Reports and Testimony	The fastest and easiest way to obtain copies of GAO documents at no cost is through GAO's Web site (www.gao.gov). Each weekday afternoon, GAO posts on its Web site newly released reports, testimony, and correspondence. To have GAO e-mail you a list of newly posted products, go to www.gao.gov and select "E-mail Updates."
Order by Phone	The price of each GAO publication reflects GAO's actual cost of production and distribution and depends on the number of pages in the publication and whether the publication is printed in color or black and white. Pricing and ordering information is posted on GAO's Web site, http://www.gao.gov/ordering.htm.
	Place orders by calling (202) 512-6000, toll free (866) 801-7077, or TDD (202) 512-2537.
	Orders may be paid for using American Express, Discover Card, MasterCard, Visa, check, or money order. Call for additional information.
To Report Fraud,	Contact:
Waste, and Abuse in Federal Programs	Web site: www.gao.gov/fraudnet/fraudnet.htm E-mail: fraudnet@gao.gov Automated answering system: (800) 424-5454 or (202) 512-7470
Congressional Relations	Ralph Dawn, Managing Director, dawnr@gao.gov, (202) 512-4400 U.S. Government Accountability Office, 441 G Street NW, Room 7125 Washington, DC 20548
Public Affairs	Chuck Young, Managing Director, youngc1@gao.gov, (202) 512-4800 U.S. Government Accountability Office, 441 G Street NW, Room 7149 Washington, DC 20548